

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF ALABAMA

IN RE:) CHAPTER 13
TONY HARRIS)
MISTY HARRIS) CASE NO. 16-31842-DHW-13
Debtor(s).)

OBJECTION TO CONFIRMATION

Now comes ALABAMA STATE EMPLOYEES C.U., by its attorneys, Chambless Math
❖ Carr, P.C., and objects to confirmation of the Debtor's proposed plan and in support thereof
states as follows:

1. This creditor has filed Court Claim #1 in the amount of \$14,167.19, Court Claim #2 in
the amount of \$1,835.27 and Court Claim #3 in the amount of \$4,347.39 all of which are secured
by one 2011 HONDA PILOT.

2. The collateral securing the debts of the creditor is grossly undervalued and/or the
specified monthly payment is insufficient to provide this creditor with adequate protection
against depreciation of its interest over the term of the plan. The plan proposes to value the
collateral at \$15,450.00 whereas the NADA retail value less a deduction for 84,000 miles is
\$19,400.00.

3. The plan fails to provide for the secured claim of this creditor as required by 11 U.S.C.
Section 1325(a)(5). The plan fails to make secured provisions for the cross-collateralized claim
of this creditor. Court Claim #2 should be allowed as secured in the amount filed of \$1,835.27.
Court Claim #3 should be allowed as secured in the amount of \$3,397.54 with the remainder as
general unsecured.

WHEREFORE, ALABAMA STATE EMPLOYEES C.U., prays for an Order denying
confirmation along with such further relief as the Court may deem proper.

ALABAMA STATE EMPLOYEES C.U.

By: /s/ Leonard N. Math

Of Counsel:

Chambless Math ❖ Carr, P.C.

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served on all attorneys of record as set forth below by electronic notice and/or depositing a copy thereof in the United States mail postage prepaid on this August 25, 2016.

CURTIS C. REDING

Chapter 13 Trustee

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TONY HARRIS

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/s/ Leonard N. Math